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December 19, 2018

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

RE: Case 18-C-0396 T-Mobile/Sprint Merger

Dear Secretary Burgess:

The Rural Schools Association of New York is a member-driven organization representing the specific needs and particular interests of the small and rural school districts in New York State. We are a state affiliate of the National Rural Education Association, which recently sent a letter to the FCC in support of the T-Mobile and Sprint merger that is attached for your reference.

Our organization was formed to better advocate for rural schools, which are frequently underfunded and politically marginalized. A primary goal of ours is to inform those in state leadership positions of ways to improve educational opportunities in rural school districts. Many of our issues are ongoing, such as how to address declining enrollment and maintain adequate funding levels.

The merger of T-Mobile and Sprint would have a positive, long-term effect on rural schools and the students who attend them. Rural America suffers from underinvestment in mobile broadband. Roughly 14 million Americans still lack access to mobile LTE broadband at download speeds of 10 Mbps, and access to speeds of at least 10 Mbps has remained flat in rural areas over the last several years even as urban areas have seen steady improvements in broadband performance and reach.



Communities Committed to Educational Excellence

Rural educators have talked about closing this digital divide for two decades. But the divide has only grown worse over time and has now begun to manifest itself in new ways as students who lack reliable Internet access at home face new barriers to completing school assignments. This “homework gap” is at its most pronounced between students in rural and urban areas and, today, poses one of the most intractable challenges rural educators face.

The economics of investing in geographically distributed, sparsely populated regions with heterogeneous terrain conditions is inherently unfavorable. Broadband deployment requires assembling spectrum assets, laying fiber, building towers, and acquiring backhaul – activities that require scale and sophistication that far exceeds the efforts of any school district or, candidly, all but the largest wireless broadband operators.

The proposed merger of T-Mobile and Sprint will provide New T-Mobile with a compelling business case to invest in rural America. New T-Mobile has said it expects to invest nearly \$40 billion more in its 5G network, much of it in rural America. The combined company can expand services more broadly into rural communities because it can spread the costs of deployment across a larger number of customers. And New T-Mobile can improve the quality and coverage of its service in rural areas by taking the best of each standalone company’s individual assets. T-Mobile’s low -band spectrum provides excellent coverage, but limited capacity. Sprint’s mid-band spectrum provides excellent capacity, but limited coverage. Combined, the two companies’ assets promise immense capacity gains at a cost low enough to make covering rural America an affordable – and even attractive – business proposition. New T-Mobile’s commitment to investment and unique mix of spectrum assets promises to encourage the incumbents to step up their investments in rural areas as a means of retaining existing subscribers and attracting new ones.

From our vantage point, the competitive rivalry we see growing from the merger of T-Mobile and Sprint promises to go a long way toward closing the digital divide. And by extending high-speed wireless to rural communities, we may make a dent in the homework gap, too. Students in New York can enjoy the full benefit of broadband access, including at home to do homework or research a project, and finally provide rural students with some of the critical tools they need to succeed.

We understand that the Commission's review of the merger is limited to examining the effects on Sprint's wireline services and the subsequent change in control of those assets. But given the significant disparity in online access rural students in New York experience, we wanted to highlight what is perhaps a less-frequently considered benefit of the merger. We sincerely hope that this comment is considered as you deliberate this issue.

Sincerely,

A handwritten signature in black ink that reads "David A. Little". The signature is written in a cursive style with a large, stylized "L" at the end.

David A. Little, Esq., Executive Director
Rural Schools Association of New York State